

V. ANALYSIS OF SPECIFIC AREAS WHERE FAIR HOUSING IMPEDIMENTS COULD OCCUR

This section of the AI presents a comprehensive review of the housing rules, policies, procedures and practices for public and private sector agencies and organizations which may directly or indirectly influence fair housing opportunities in the Fresno community.²

A. PUBLIC SECTOR REVIEW

The results of the public sector comprehensive review disclose policies and practices which could be modified in a manner that will enhance the City's ability to proactively further fair housing choice. The City Development Department is currently updating its General Plan. The draft plan is expected to be published and forwarded for environmental review pursuant to the requirements of the California Environmental Quality Act by summer 1999. City Development Department staff, working with interested citizens and public and private sector organizations, is reviewing existing plans and policies. Inherent to that process is a comprehensive review of changes to local, state and federal laws and regulations that have occurred since the previous updates. The latter analysis is intended to ensure that any weaknesses in land use policy, including outdated and ineffective policies, are identified, and deleted or revised.

Staff is currently reviewing zoning ordinances and other processes related to land use and development to determine whether any City regulations are intentionally or unintentionally increasing development costs, hampering the development of properly zoned land, or are otherwise counterproductive to the provision of housing and urban services within the City. Staff has been instructed to use the General Plan and AI update processes as tools to assist staff with the update and development of policies and Code amendments that further housing goals. The interaction between these two updates should cause improvements to both documents thus enhancing the City's

²The City has also provided information regarding programs to eliminate or discourage impediments to fair housing choice, an iteration of recent City actions that are affirmatively furthering fair housing, some analysis of work in progress, and a description of work that needs to be done. Identified constraints and impediments have been consolidated into eight categories. The list of impediment categories and the associated action plans is provided in Section VII and Appendix A of this revised AI.

ability to achieve its housing goals. With this goal in mind, the following sections include analysis and some proposals not required by law but inherent to the City's commitment to the provision of fair housing opportunities for all who live here.

1. Currently Targeted Constraints to Affordable Housing Development

Land use policy development, zoning actions, and related reviews are guided by state planning law, the California Environmental Quality Act, the Cortese Knox Local Government Act of 1985 as amended and other laws enacted to protect the public health and safety. While land use review processes can sometimes slow the provision of fair housing, mainly by affecting affordability and availability, the proper use of land use powers is necessary to the provision of safe and decent urban environments. Safe, properly spaced buildings, adequate infrastructure, environmental impact mitigation, conservation of prime agricultural and open space lands, and avoidance or abatement of nuisance and safety problems are necessary for the provision of a safe and healthy living environment. Some urban blight, safety, and inadequate infrastructure problems in older target neighborhoods can be traced directly to construction that occurred before zoning regulations and upgraded building codes were implemented. It is the City's experience that the financial and human costs of repairing past mistakes are higher than the costs of avoiding future mistakes.

With this in mind, the City has adopted land use and building regulations designed to provide fair housing opportunity and protect the public health and safety. The City has also been implementing an ongoing program to eliminate or mitigate unnecessary or unavoidable constraints to appropriate urban growth and the provision of fair housing. This includes programs to avoid or streamline technical, administrative or other potentially counterproductive processes and programs. The following items highlight some key problems the City has faced while trying to accommodate rapid unprecedented urban growth and development. It should be noted that many of the constraints disclosed in this section have already been minimized by City programs.

- **Development Application and Permit Processing** - The City Development Department is responsible for implementation of general, community, and specific plans, for inspecting the construction and remodeling of buildings and for the administration of zoning, subdivision, environmental, and urban growth management ordinances. Ineffective department procedures can adversely impact the private sector's ability to provide quality housing in a timely fashion. It was determined in the early 1990s that the City's application processing system could be causing unnecessary delays to development. Such delays can drive up housing costs.

Residential development projects are subject to several types of review and analysis during the application process. For example, applications are reviewed for consistency with building codes, ordinances, plans and policies, reviewed by fire and police departments among others depending on project specifics, reviewed by affected special districts and subject to environmental review pursuant to the California Environmental Quality Act (CEQA) and the National Environmental Policy Act, where appropriate.

During the past five years, the City has carried out a series of development services reorganizations designed to increase service efficiency and effectiveness. For example, the routing of tentative residential subdivision maps has been significantly expedited because all but one review agency, the Fresno Metropolitan Flood Control District, are now located in one area within City Hall. The City has implemented other programs designed to reduce or avoid unnecessary delays. The City currently implements concurrent review procedures. This program has been successful in streamlining the processing system.

One area where streamlining is most effective is in the conduct of environmental reviews pursuant to CEQA. Environmental assessments are now conducted simultaneously with other entitlements and do not substantially add to the processing time unless an Environmental Impact Report (EIR) and/or Environmental Impact Statement are required. Due to state requirements, and depending on the number and complexity of potential impact areas, the time required for an EIR can range between six and eighteen months. However, EIRs are required on less than 1 percent of all residential development projects. In cases where EIRs are required, the benefits of identifying, avoiding, or mitigating adverse environmental impacts produces health and safety benefits for future residents that greatly outweigh the costs of necessary delays.

While the efficiency of the development process has been greatly improved, much work remains to be done. The City Development Department is committed to continual improvement of its development application processes and procedures.

- **Development Fees and Assessments** - Since Proposition 13 was passed, land use jurisdictions have been struggling to find ways to fund the infrastructure and municipal services that must be provided to urban areas. Without adequate funding resources and choices, the City has been forced to require that new development areas bear the cost of service provision. The City Council adopted an Urban Growth Management (UGM) fee which is applied to all non-infill

residential projects. The purpose of this fee is to allocate to property owners the cost of the increased demand upon municipal services that occurs with new development.

Within the UGM area, fees and improvements can add as much as \$3,000 to the cost of a modest three bedroom home. It is the City's position that the benefits of the provision of quality sidewalks, streetlights, roads, sewers and utilities outweigh the costs. Additionally, there are indications that the market, to a much greater extent than assessments and fees, determines housing prices. Substandard infrastructure has been identified as a major deterrent to the health and revitalization of neighborhoods. It is important to ensure that new neighborhoods are not subject to the same problems that plague the City's older neighborhoods.

- **Application Processing and Permit Fees** - All project proponents must pay a processing fee when filing a development application. Filing fees differ for each type of project because the fees are only intended to cover processing costs. Since 1984, City (sewer, water, etc.) and public school fees have significantly increased and now amount to approximately \$5,000 per unit. These costs, when evaluated as a percentage of the total, have remained relatively constant over time.
- **Dedications and Improvements** - Land dedications are typically required for new residential construction. Typical dedications and improvements include those for adjacent streets, the extension of sewer and water lines and construction of curbs, gutters and sidewalks. Public improvements in non-UGM areas are viewed by the construction industry as a constraint to the production of affordable lower-cost housing. In response to industry concerns, the City has reduced cross section width and improvements required for local streets.
- **The Cortese/Knox Act of 1985 (Annexations/Sphere of Influence Updates)** - The Cortese/Knox Act requires that the Fresno Local Agency Formation Commission (LAFCO) act to ensure that jurisdictions consider the importance of open space and agricultural land when designating new areas for urban growth. The Act requires that fiscal, environmental, boundary and service provision issues be addressed if a City seeks to annex County land with the intention of designating that land for urbanization.

In the early 1990s, the Building Industry Association identified annexation delays and duplicative efforts as a key deterrent to efficient urban growth. The City has worked with Fresno County and LAFCO to produce a more efficient application and prezone process. The City and County have adopted an annexation tax-

sharing agreement that can be applied to all annexations thus reducing processing times. These efforts have greatly reduced the time necessary to rezone new land needed for development.

2. Additional Other Constraints

a. Outdated US Census and Other Data Issues. It has been almost ten years since the last US Census. As time passes, State Department of Finance (Census data updated with DMV, birth and death rates and other statistics) and local Council of Government population projections and other statistics become less reliable. In addition, use of the latter statistics is difficult because it is not organized in the same manner as US Census data.

b. Housing Needs Data. The City projected a need for 65,759 owner-occupied units, 70,539 rental units, and 8,545 vacant units by the year 1996 for a total of 144,843 units. Land designated for residential uses by the 1984 General Plan is projected to accommodate anticipated growth through the turn of the century. The holding capacity of the City's Sphere of Influence is estimated at approximately 228,900 units. During the 1999 General Plan Update, the City will project housing needs over the next twenty years.

c. Public Hearing Process/NIMBYISM. A major issue related to the placement of affordable housing in existing neighborhoods, including apartments and planned unit developments, is neighborhood opposition. Hearing records indicate that residents often oppose anything other than single-family homes of a comparable or higher value. Frequently expressed concerns are that apartments or lower-valued dwellings will decrease property values and increase traffic, noise and crime. These concerns often have some validity but are just as often reflections of social and economic prejudice. In either case, expression of these concerns form a powerful argument at public hearings. Such expressions could cause commissioners or elected officials to consider denial of applications for needed housing.

The City is unaware of the denial of any housing development project for NIMBY reasons. To the contrary, the Planning Commission and City Council approved more than one group housing facility project in the past year. One, a halfway house for people recovering from drug and alcohol dependencies, was approved over strong neighborhood opposition. The City will continue to educate staff, elected officials and appointees regarding the need to continue to resist "NIMBY" (not in my back yard) opposition to group homes and affordable housing developments.

d. Criminal Activity. Crime levels vary considerably throughout the City. Where crime rates are highest, usually in the older and poorer areas, financial institutions are reluctant to invest in new housing or the rehabilitation of older housing. Home buyers and renters are reluctant to locate in these areas if other alternatives are available. These factors may deter upgrading of housing stock and may result in under-utilization of vacant land. The City is working to reduce crime through the facilitation of neighborhood watch programs, augmentations to crime prevention units, youth recreation programs, community policing, public education and economic improvement programs. The intent of the latter is to provide economic incentives for businesses that produce more jobs.

3. Siting of Social Services

In 1997, the County of Fresno Human Services System reported to the Board of Supervisors that the siting of social services was a constraint to the provision of a variety of health and human services programs including welfare, training, medical, housing, counseling and substance abuse. It was determined that most service centers were centralized and therefore difficult for service users to access. Clients who most needed services, such as large low-income families, those with children, the elderly and persons with disabilities often could not afford cars and had difficulty using transit. Clients were also required to travel to different locations for each type of service. The Board of Supervisors directed County staff to decentralize services.

Based on that directive, staff identified where clients lived. Then, a transition team divided the County into five distinct geographic regions: Southeast, Southwest, Northwest, Northeast and central (City of Fresno). The City had the largest number of clients followed by the southeast region. Based on that information, the County, in cooperation with the City, created a task force consisting of experts from all service needs areas.

The group was asked to develop a prototype for multi-disciplinary, full service centers. The group was also instructed to conceive a plan that would effect the integrated delivery of services and avoid duplication. It was concluded that a single centralized center would be unwieldy and unresponsive to the needs of clients. The goal was to determine an appropriate number of localized service units. The criterium for siting was to use the shortest distance for the greatest number of clients.

The program enables service providers to tailor services to community needs, enables more effective networking with local community resources, and positively mitigates transportation issues within each region. Each center is similar in size with respect to the number of clients accessing the system with approximately 75-125 public agency

employees on-site. The program is being implemented one area at a time with ongoing assessments. Staff from the four departments of the County Human Services System will be working with community based organizations, the Probation Department, the District Attorney's Office, incorporated cities and others to optimize program efficiency and effectiveness. The first of five planned facility sites has been leased. The facility will open in July 1999 in Selma. After evaluation of the operation and incorporation of any needed improvements, a second site should be opened in 2000. The program will improve access to needed services.

4. Planning Policies, Zoning and Site Selection

Cities in California are charged with the implementation of state planning law. Cities must project land use and housing needs, develop plans for growth and implement them. The following section provides discussions of various land use issues that affect housing.

a. Housing Stock and Residential Land Supply. The City has aggressively pursued the adoption and implementation of plans and programs designed to provide affordable housing stock over the short and long terms. During the period 1980 to 1990, the City nearly doubled the existing housing stock with the addition of 40,655 housing units or 45.8 percent of the total housing stock. In 1997, the City reported an existing housing stock of 145,696 housing units. The total number of single-family units was 91,968, or 63 percent of the total, and multi-family units numbered 53,728 units, or 37 percent of the total housing units. These numbers represent an increase of 2 percent in the ratio of single family to multiple family units since 1994.

Vacancy rates in 1999 are 5.8 percent citywide, based upon a total of 7,597 housing units surveyed divided as 4,452 units for rent and 1,191 units for sale. While vacancies citywide were only 5.8 percent, there were areas where the vacancy rate was much higher. As an example, apartment units south of Shaw Avenue, were determined to have nearly a 15 percent vacancy. In the short-term, high vacancy rates produce greater housing choice and decrease housing discrimination. The reason is that landlords and rental agents offer rental discounts and other incentives to prospective tenants in order to reduce vacancies. Issues, such as large family-size, ethnicity, income, familial status, etc., all of which would constitute housing discrimination if used as the basis for refusing to rent a unit, become secondary to the need to reduce vacancies. Consequently, these forms of housing discrimination are also reduced. In the long-term, significant vacancies in rental units reduce construction of multi-family units and, as demand becomes greater than supply, it may reduce housing choice for low-income households. It must be noted that the City has an unusual vacancy situation in which affordable units are not rented because no

suitable tenants can be found. The City, Fresno Rental Housing Authority and Housing Authority are attacking this problem by supporting or developing proactive tenant education programs, or providing rental subsidies. The City is aware that high vacancy rates may occur in more dilapidated areas thus pushing members of protected classes into less desirable housing. The City is aggressively pursuing code enforcement and revitalization programs to provide suitable affordable housing in these areas.

The City's General Plan update process includes the projection of housing and land use needs during the next twenty years. Inherent to the update is the assurance that an adequate supply of land planned and zoned for single and multiple family housing is available. Encouraging infill development on land which already has infrastructure and access to public transit, providing a supply of smaller, lower priced parcels, and supporting density bonus programs designed to reward property owners for providing affordable housing for seniors, persons with disabilities and other low-income groups are current General Plan goals to be enhanced as part of General Plan approval.

The City has zoned a significant amount of vacant land for medium density residential land uses ranging from five (5) to ten (10) units per acre and medium-high density land uses ranging from ten (10) to eighteen (18) units per acre. However, the quantity of land designated and zoned for higher density land uses ranging from nineteen (19) to forty (40) units per acre, is limited. A scarcity of higher density housing opportunities could adversely affect the City's ability to provide affordable housing because more units per acre usually translates into lower costs per unit.

The City also has a density bonus program. Under this program, developers who provide housing for senior citizens or other low-income groups can build more units than are generally permitted in the land use zone. The City Zoning Code also permits the construction of a small (640 square feet) accessory dwelling on single family lots. The "granny" flats permit the construction of low cost housing within existing neighborhoods, thus increasing the housing potential of single family residential neighborhoods.

b. Land Use Policies and Plans. The City has adopted a Housing Element to its General Plan. Pursuant to state law, the City's housing element consists of, "...an identification of existing and projected housing needs, and a statement of goals, policies, quantified objectives, and scheduled programs for the preservation, improvement, and development of housing. It is further required that the housing element identify adequate sites for housing including rental housing, factory-built housing, and mobile homes, and make adequate provision for the existing and projected needs of all economic segments of the community."

The City's General Plan Housing Element was reviewed by the State Housing and Community Development Department (HCD) in 1992 and 1995 per legislative requirements. The City received a letter from HCD stating that the Element was thorough, comprehensive and "outstanding" in the description of the housing programs and integration with the CHAS. The HCD has certified the City's Housing Element as complying with state law.

In Chapter VI of the Housing Element, the City adopted the statewide housing goal as follows: "To assure to all Californians the opportunity to obtain safe, adequate housing in a suitable living environment." In addition, the City adopted housing policies and programs that are consistent with the following four housing goals established by the HCD:

- (a) the provision of new housing;
- (b) the preservation of existing housing and neighborhoods;
- (c) the reduction of housing costs; and
- (d) the improvement of housing conditions for special-needs groups.

The Housing Element legislation acknowledges that local jurisdictions are best able to identify housing needs within the community and to determine the best approach to address this need. It also professes a need to seek support and funding from the state and federal agencies who are committed to furthering fair housing goals and objectives. The following is a list of some of the City's adopted policies that are intended to affirmatively further fair housing:

- Provide housing that varies sufficiently in location, cost, design, style, type and tenure to meet the housing needs of Fresno-Clovis Metropolitan Area (FCMA) residents.
- Provide housing opportunities without discrimination on the basis of race, religion, ethnicity, sex, age, marital status, household composition or other arbitrary factors. (The City is proposing to revise this policy during the Housing Element update to clarify it by adding the terms "color," "national origin," "sexual orientation," "source of income" and "handicap/disability.")
- Provide quality housing and preserve housing quality within the FCMA.

- Provide sufficient amounts of residentially designated land and infrastructure for all housing types.
- Assist in the provision of decent housing for those FCMA residents who otherwise cannot afford such housing.
- Support development of the CHAS (now Consolidated Plan) which identifies current and projected housing affordability needs of the community, to access available and potential resources and to inventory existing institutional capability to meet the identified housing needs.
- Utilize redevelopment authority and the 20 percent Housing Set-Aside (HSA) to provide for affordable housing.
- Encourage the development of housing by nonprofit organizations.
- Provide comprehensive and updated housing-related demographics to the development community and nonprofit organizations.
- Participate in the State Finance Resource Clearinghouse and/or use other techniques to leverage housing program funds.
- Increase housing opportunities for very low- and low-income families with five or more members (large, related families).

The programs included in the Housing Element of the General Plan are designed to maximize the availability of a diverse housing stock by size and type. The adopted land use policies promote increased housing density that encourages greater housing affordability. Housing Element policies and related action plans are detailed in Section VI (A) of this report. Housing Element policies are also supported through Consolidated Plan action programs. Section VI (B) includes a description of Consolidated Plan Programs

c. Zoning Requirements. The City does not zone land specifically for the development of affordable housing nor does the City offer specific sites for development. Developers, the property owner or nonprofit housing development corporation locates a suitable site for development and prepares a project pro forma or feasibility study. In some cases, a project may be developer funded. In some cases, a project may be brought to the City for funding consideration. Following a review by City staff, the development project is either recommended for approval, approval and funding, or denial. Recommendations are forwarded to the Planning Commission

with a staff report. If the Planning Commission denies a project, the decision may be appealed to the City Council.

It should be noted that affordable housing development projects are required to follow the same procedures for project approval as all other projects. The project proponent must secure all required entitlements (permits). The City must conduct a public hearing to receive public comment. If the land is zoned to accommodate the development “by right”, which means that the development does not require any zone changes or variances, then no public hearing is required unless specified by code. In these cases, the builder must still secure necessary water, sewer and other building permits. For example, the Development Department will check to ensure that ground level apartments are fully accessible for the physically challenged.

The City’s zoning ordinance reflects State Health and Safety Code sections which exempt state-licensed residential care facilities from regulations when such facilities care for six or fewer clients. State-licensed facilities wherein medical or other care is rendered to six or fewer resident clients are allowed in any residence in any zone district in the City. There is no requirement to apply for special zoning or for a use permit, nor are there any public hearings if the residential care facility is state-licensed and has six or fewer clients.

The City’s zoning ordinance does set standards, including requirements for Conditional Use Permits, for other residential settings which may house and serve special needs groups or more than one housekeeping unit. The reason for this is to ensure that adequate parking, emergency vehicle access, and safety features are provided. The City is reviewing these standards with the intent of determining if public protection guidelines are inconsistent with fair housing regulations.

Several community groups have pointed out the fact that well intentioned safety regulations may actually work to impede the provision of fair housing opportunities. With this in mind, the City Development and Housing and Neighborhood Revitalization Departments are determining whether all standards and building permit reviews need to be extended to all multiple family units, eliminated or otherwise changed. The City is also evaluating the relationship between the need to ensure that reasonable accommodations are made and the need to provide appropriate safeguards for those who need to be accommodated. In any event, it is the City’s intent that no sector of the population should be treated unequally.

d. Reasonable Accommodation Proposal. As previously stated, the City will be updating its Zoning Ordinance over the next three years. The City has placed priority on the removal of outdated provisions which may inhibit the free development of

housing opportunities for persons with disabilities. The Conditional Use Permit process applies and is proposed to be continued, but the City is also proposing to adopt a free- or low-cost process through which a member of the public can request reasonable accommodation. Whether not allowing a particular site development to proceed deprives one of “full enjoyment of the premises”, or refusal to make “reasonable accommodations” in rules or policies is “necessary to afford equal opportunity to use and enjoy a dwelling” (to use the statutory language), is not easily definable and will invariably depend on the particular facts. This is what makes reasonable accommodation a fair process. Under the reasonable accommodation land use review process, the City staff will review a project site to modify standards, such as the number of parking spaces required, that might interfere with housing but which are not necessary for the City to achieve its zoning goals. For example, a group home or hotel development for quasi-independent mentally retarded or mentally ill persons may have a need only for a few parking spaces, and the City can approve a greater number of residents, if the management or owner of the facility can show that the residents don’t drive. The Proposed Ordinance is expected to go to hearing in early 2000.

City zoning regulations contain elements that further fair housing. Density bonuses included in the Zoning Code are an excellent incentive to the development community to provide affordable housing units. They promote the integration of affordable units into market rate developments. Concentration of significant numbers of affordable housing units in a dense configuration can lead to the deterioration of neighborhoods and the early decline of the housing units. A related program is the local planning and procedures ordinance which allows for residential density transfers and for a better mix of residential densities which provide for more affordable and varied housing types. This program also promotes the integration of housing suitable for a range of income levels. The Accessory Housing Ordinance establishes standards by which residents are allowed to build a second, attached housing unit on a single-family parcel.

e. Locational Choice. As part of the General Plan update process, City Development Department staff has reviewed land supply numbers and locations. It is staff’s position that there is an ample supply of residential zoned land throughout the City. For example, houses in the \$85,000 range are available in all community plan areas. It is the City’s position that dispersion of affordable housing promotes a diversity of income and culture that is healthy for a community.

Some target areas, such as the Roosevelt Community, have significant amounts of vacant land available for single and multiple family housing. A new sewer trunk line is planned for the western area of the City. The completion of the trunk line will open

up even more land for residential uses. Unfortunately, developers often prefer locating new housing projects in the northeast area of the City because parcels are large enough to facilitate development and ensure a greater profit. They also prefer to implement up-scale projects in these locations. The City through its revitalization, environmental clean-up and economic incentives programs is seeking to make infill and other vacant areas more attractive for housing uses.

5. Neighborhood Revitalization, Municipal and Other Services

The City provides equal levels of utility and related services to all neighborhoods. Unfortunately, all neighborhoods do not have the same quality of infrastructure. This is particularly true in older central city neighborhoods where housing is more affordable and low-income residents are concentrated. These neighborhoods are generally more affordable because of deterioration. Often, housing has not been well-maintained and older stock does not attract those families with the greater economic means necessary to maintain or upgrade homes.

These neighborhoods generally suffer in appearance and do not have the amenities of newer neighborhoods. The sidewalks are often old and cracked, curbs and gutters may be absent, a planned streetscape, if it exists, may not have been properly maintained. Generally, streets and sidewalks do not meet ADA accessibility requirements. Related deterioration of employment and economic activity can raise unemployment rates, and limit shopping and retail resources.

The City has determined that there is a significant need to improve the infrastructure and economic climate within these neighborhoods. Inherent in this plan is the equalization of conditions in all areas. As a result, the City has assigned high priority to neighborhood street improvements, crime prevention, recreation programs and economic development activities in low-income areas.

Enhanced code enforcement is a component of the concentrated resources program for older, inner-city neighborhoods. A major purpose of enhanced code enforcement is to stabilize and improve these neighborhoods and to preserve the existing housing stock. The priority of activities is based upon input received from the residents of these older, deteriorating neighborhoods.

The City is targeting block grant funding and other resources toward meeting the needs of households in these areas. The CDBG regulations require that funding be targeted in census tracts that are reported with at least a 51 percent population of low-to moderate- income households. In compliance with the regulations, the City continues to focus on using CDBG funding for specific CDBG neighborhood street

projects. Twelve street projects were completed in FY 1999. By the end of FY 2000, the City estimates that approximately 40 low-income neighborhoods will have been revitalized through infrastructure, code enforcement and community sanitation activities. The City provides emergency repair and senior paint grants among its programs.

Since 1993, the City has allocated the majority of its CDBG public service funds to the Problem Oriented Policing (POP) Program. Through this program, teams of specially trained officers are concentrated in CDBG-eligible areas not only in a reactive mode, but more importantly, in a proactive mode. The officers work exclusively with selected neighborhoods to help weed out problems. While working closely with neighbors as well as other City departments, such as Code Enforcement, Public Works, Housing, Community Sanitation and Parks, these efforts have been proven to reduce crime and make areas with a larger supply of affordable housing more attractive.

The City funds Care Fresno as part of its police assisted community improvement program. The Care Fresno Team was created to look for ways to prevent crime thus reducing the need for police to concentrate on crime response calls. The team consists of a full time police officer, a civilian employee and members from a local church networking group called Evangelicals for Social Action. The team coordinates service delivery, matches volunteer groups with POP projects and introduces them to the POP project officer. Since the program began, three years ago, police calls in target areas have dropped by 60 percent. Child literacy improvement has exceeded City expectations by 10 percent (a 17 percent improvement for participating children.) 300 volunteers are now working on this project.

6. Public Housing Authority (PHA) and Other Assisted/Insured Housing

In Fresno, the PHA is the Housing Authorities of the City and County of Fresno, California. The following discussion applies to that agency.

a. **General.** The City does not provide public or subsidized housing directly. Residents must apply for assisted housing through the Housing Authority, an independent public agency. Initial eligibility for housing assistance is based on family income. In order to qualify for admission to either public housing or Section 8 rental assistance, a family's total annual income must not exceed 80% of the area Median Family Income (MFI). The Housing Authority has established certain criteria for obtaining preferences, such as a government action that permanently displaces a family or household (relocation) or a natural disaster that causes permanent displacement. No preference is given to applicants who possess mental or physical

disabilities. However, the Housing Authority sets aside 5% of its units for persons who need accessible units or other accommodations. A goal of the Housing Authority is to make all units accessible.

b. Public Housing, Section 8 and Other Programs administered by the Housing Authority.

Public Housing Program - The Housing Authority of the City of Fresno owns 19 multifamily housing complexes with 1,116 units. One hundred sixty nine (169) have one bedroom, 511 have two bedrooms, 308 have three bedrooms, 109 have four bedrooms, and 19 have five bedrooms. The Authority also owns 108 single family homes scattered throughout the City. HUD subsidizes the management and maintenance of this housing as part of their public housing program.

Section 8 Housing Assistance Payment Programs - Within the City, the Fresno Housing Authority provides Section 8 rent subsidies to 5,123 families. County-wide 6,248 low income families are assisted by the Housing Authority via Section 8 Programs. The Housing Authority administers Certificate, Voucher, Over Fair Market Tenancy, Beyond Housing, and Family Unification programs.

Section 8 Existing Housing Certificate Program - Through this program, the Housing Authority maintains a “finders-keepers” policy under which eligible participants secure the housing of their choice. An eligible family receives a Certificate of Family Participation from the Housing Authority. This Certificate enables the family to find a suitable dwelling anywhere in Fresno County that meets health and safety standards.

The Section 8 Voucher Program - The Voucher Program is similar to the Certificate Program except that the amount of rent paid for the unit may exceed the HUD-established maximum fair market rent amount for Fresno County. Families pay the difference to the landlord, and the amount of rent paid may exceed 30% of each families’ adjusted gross income.

Over Fair Market Rent (FMR) Tenancy - Over FMR Tenancy allows Section 8 participants to rent units for more than the fair market rent. The renter pays the difference to the landlord. This program is helpful to participants with physical disabilities that require special accommodations. Exception rents allow for compensation to be paid to the owner who makes the special accommodations.

Beyond Housing Program - This program sets aside Section 8 certificates designated specifically to assist individuals with physical disabilities or developmental delays, as well as those persons with mental illness who are able to live independently with support services. The program is operated in cooperation with the Center for Independent Living, the County Health Services Agency and the Central Valley Regional Center. The Fresno County Mental Health Department and the Center for Independent Living are responsible for identifying, certifying and referring eligible clients with disabilities to the Housing Authority. Housing Authority staff determine eligibility for Section 8 rental assistance and work closely with case managers from both organizations to resolve issues that arise. The Housing Authority provides assistance to the physically and mentally challenged who need housing including home visits, transportation, interpreters, and other accommodations. The Housing Authority also helps to resolve problems for mentally ill individuals who are at risk of losing their home because they can not manage interpersonal relations with landlords or neighbors.

Family Unification Program - This is a special set aside of Section 8 Certificates designated to assist families who are separated or facing separation because of lack of adequate housing. Eligible families are identified and referred to the Housing Authority by Community Health Nurses, Environmental Health and Family Services within Fresno County's Human Services System.

Plaza Apartments - The Housing Authority's Emergency Housing Program includes operation of the Plaza Apartments. This apartment complex is used to provide housing to adults and children who are without money or housing. Supportive services are also provided.

In 1998, a total of twenty-four (24) units were reported as occupied by a disabled head of household. The Housing Authority does not maintain demographic data that distinguishes disabled heads-of-household based upon the type of disability.

The Housing Authority maintains a waiting list for Section 8 assistance of more than 11,000 families. Because of the size of the waiting list and the number of families that need subsidized housing, applications for assistance are only accepted once per year. Eligible applicants may remain on the waiting list for several years until a certificate or voucher is obtained. An applicant is removed from the waiting list if subsequently found to be ineligible, the applicant fails to respond to the annual letter which inquires whether or not the applicant wishes to remain on the waiting list, or at any time by personal request of the applicant.

The Housing Authority maintains a referral listing that is updated each week of property owners interested in renting under the Section 8 Program. Individual listings remain for sixty (60) days or less if the owner notifies the Housing Authority that the unit has been rented.

Farm Labor Housing - The Housing Authority owns, manages and maintains a farm labor housing complex on the western edge of the City of Fresno. Development of the 40 apartments was financed by United States Department of Agriculture (USDA) Rural Development Program. Residents of farm labor housing must legally reside in the United States, and must derive at least half of their income from a farm-related source. This housing is occupied year-round. USDA subsidizes the rent paid by most residents of Farm Labor Housing through their Rental Assistance Program. Through that program, low income farm worker families pay 30% of their adjusted gross income toward the rent owed, and the balance of rent is paid by USDA-Rural Development to the Housing Authority.

Home Ownership Opportunity Financing and Education Programs - The Housing Authority is actively involved in creating home ownership opportunities with five programs that assist low income first time home buyers. These are the Home Ownership Opportunities Program (HOP), Housing Opportunities for People Everywhere (HOPE 3), Mortgage Credit Certificates (MCC), Down payment Assistance Programs (DAP) and the Homeownership Opportunity Training Program. A description of each program follows.

Home Ownership Opportunities Program - The Home Ownership Opportunities Program allows prospective buyers to accumulate a down payment, called a Home Ownership Reserve, from the Housing Authority's budgeted maintenance costs. Residents of single family homes owned by the Housing Authority receive the benefit of accumulating the reserve on the assumption that they perform routine maintenance on the home, thereby saving the Housing Authority labor and material costs. A training course is provided to residents to teach them the skills necessary to perform routine maintenance tasks. This course is a key ingredient to the success of the Home Ownership Program. One hundred seventy (170) single family homes will eventually be sold to public housing residents through the Home Ownership Opportunities Program. Title has already been transferred to 62 families and another 85 are actively participating in the program.

Housing Opportunities for People Everywhere - HOPE 3 - The HOPE 3 program targets low income families. HOPE 3 is a comprehensive program for potential home buyers and involves site acquisition, relocation and

rehabilitation of freeway houses, and training to teach renters the skills necessary to own a home. Through this program, 27 of 32 purchased homes have already been sold to low income families.

Mortgage Credit Certificates -The Housing Authority administers a Mortgage Credit Certificate (MCC) program which provides first time home buyers with a federal tax credit equal to 15% of the annual interest paid on the first mortgage loan. The annual credit continues as long as the owner occupies the residence and maintains the original mortgage.

To date, the MCC program has issued 1001 certificates. In the year ending June 30, 1999, 23 MCCs were issued to home buyers. Six families (26%) had very low-income (incomes less than 50% MFI), seven (30%) were low-income (incomes less than 80% MFI), and ten (44%) had annual incomes above 80% of the area Median Family Income.

Education/Training -The Housing Authority has developed a Homeownership Training Program (HTP) to teach renters the skills necessary to own a home. The course, which was originally designed for residents participating in the Housing Authority's Homeownership Opportunities Program (HOP), is now offered to first-time home buyers throughout the community. Families participating in the HOP, HOPE 3 and Mortgage Credit Certificate programs are required to take the class. The class is also required for participants in the Down Payment Assistance Programs offered by Fresno County, Clovis and Reedley. The class meets the training requirements of Fresno City's Down Payment Assistance, FannieMae Community Home Buyer, HUD Reduced Mortgage Insurance, Habitat for Humanity-Fresno, and Neighborhood Opportunities for Affordable Housing, Inc. programs.

The HTP includes 24 hours of classroom and laboratory activity. Participants gain knowledge in financial planning, the wise use of credit, the loan application and closing process, home owners insurance, and home maintenance, including instruction on do-it-yourself home repairs, yard maintenance, and appliance maintenance. Classes are taught by qualified instructors with guest speakers in appropriate fields. Classes meet weekly for 4 weeks. The course is offered in English or in Spanish.

Five hundred seventeen (517) families have completed the HTP. In the year ending June 30, 1999, 304 families completed 12-24 hours of course time and received a certificate.

c. Resident Initiative Programs and Other Services.

The Housing Authority offers a wide variety of programs and opportunities for all families receiving assistance from the agency. Resident initiative activities are directed toward improving the quality of life for families by providing access to services designed to encourage self-sufficiency and promote economic independence. Residents are assisted in overcoming barriers that may prevent them from getting and keeping a job.

Resident Initiatives programs developed and offered by the Housing Authority are offered in conjunction with CalWORKS programs, California's plan for implementing federal welfare reform law. Welfare reform through the Temporary Assistance to Needy Families (TANF) program is having a great impact on many families living in assisted housing. Unlike previous public assistance programs, there are now strict time limits and sanctions. CalWORKS provides comprehensive employment services for able-bodied recipients of TANF.

Resident Initiatives programs provided by the Housing Authority include the Family Self-Sufficiency program, Family Education Center programs and services, and the Perfect Attendance, Karl Falk Memorial Scholarship, Youth Mentor, Building Stronger Families, and Section 3 Resident Employment programs, as well as the Comprehensive Grant Program Temporary Work Crew. The programs described below are available to Housing Authority residents; participation is not limited to those families receiving TANF.

Family Self-Sufficiency Program (FSS) - The Housing Authority started its FSS program in the fall of 1993. There are currently 425 families participating in the FSS program. The focal point is to provide guidance and case management services to participants in a variety of activities that lead to employment and, eventually, a decent living wage for the participant and their family. Each participant is required to develop a five-year action plan. Referrals are made to appropriate agencies and providers for additional supportive services as needed. Staff offers home ownership counseling. A Program Coordinating Committee comprised of 20-25 individuals from various public and private agencies, meet monthly to plan various fund-raising events, and act as ambassadors for the Resident Initiatives Program and its participants. A micro loan program has been established with monies that have been generated through the extensive fund raising efforts of the Program Coordinating Committee and the Resident Initiative Coordinator. Financial assistance is provided, when appropriate, to help participants accomplish goals and objectives.

Family Education Centers - The Housing Authority applied for and received Family Investment Center funding in 1995. Funds were used to create Family Education Centers within three public housing complexes. Each Education Center includes a resource room that is equipped with all the materials necessary to apply for a job, i.e., typewriters, telephones, computers with word processing capability and Internet access, fax machines, copiers, and paper. Job listings are posted at each Center.

In 1997, the Housing Authority successfully applied for Economic Development and Supportive Services (EDSS) funding. These funds have been used to expand services offered at the Education Centers. Local agencies are providing classes in Health Realization and Empowerment, Child Care Licensing, Parent Nurturing, and a variety of Adult Education classes, including English as a Second Language. Space is provided at no charge to providers to encourage them to bring their services on site. The Child Care Licensing program trains residents to provide in home child care. It is hoped that licensed providers will ultimately move to various private housing complexes throughout the County. An objective is to expand the number and locations of apartment complexes that provide on-site day care.

Neighborhood Job Centers Recently, the Housing Authority worked with eight other non-profit service providers to expand services offered at the Education Centers. The three Education Centers created with FIC and EDSS funding have become Neighborhood Job Centers.

The overall goal of the Neighborhood Job Centers is to provide employment readiness skills, job placement, neighborhood based skills training, entrepreneurial training, home based business development, and post-employment retention services. The Neighborhood Center concept is a proactive, highly ambitious approach to offer services to communities where Welfare-to-Work clients reside. Dozens of agencies and organizations, including the Housing Authority, participated in developing the Job Centers. The Workforce Development Board (WDB) is responsible for oversight, policy development, procurement and monitoring to ensure non-duplication, coordination of services and customer outcomes and to promote the development of joint systems. The WDB is the fiscal agent for U.S. Department of Labor Welfare-to-Work funds.

Proteus, Inc., a local service provider, is a key provider of education and training at the Neighborhood Job Centers. In addition to providing job readiness, job placement, retention and counseling, Proteus is providing

activities that address basic workplace skills, workplace ethics, communication, motivational development, decision making skills, personal appearance, attitude, conflict resolution, behavior modification, peer empowerment counseling, and 24 hour crisis hotline/counseling.

In addition to programs and services developed in cooperation with the Workforce Development Board, the Housing Authority continues to offer programs and services that encourage self-sufficiency, including scholarship and mentoring programs.

Perfect Attendance Program - The Housing Authority rewards students grades 7 through 12 who maintain perfect school attendance with a \$50 savings bond to encourage interest in education. To be eligible for the reward, students must meet the following criteria: 1) no absences from school; 2) no tardiness; 3) no excused absences, unless it is for school-sponsored activities; 4) the school must certify the student's attendance; and 5) the student must reside in housing owned by the Authority. In 1999, the Housing Authority awarded 13 savings bonds for a total of \$650. One hundred two (102) young people living in public housing have been rewarded for perfect attendance with \$5,200 in savings bonds since the program began.

Karl Falk Memorial Scholarship Program - This program was established by the Housing Authority and CSU, Fresno for undergraduate students living in public housing or leasing housing with assistance from the Section 8 program. The Program is designed to assist students in completing their higher education. Outstanding students may receive up to a maximum of \$1,000 annually. In 1999, 10 students received scholarship awards needed to continue their education. A total of 47 students have received funding.

Youth Mentor Program - The Housing Authority developed a Youth Mentor program in 1993. The program establishes a working relationship between resident youth ages 14 to 18 and employees who act as role models. Each participating young person is provided with the opportunity to see and experience the financial and social rewards of working in a professional environment. The goal is to encourage young people living in public housing to further their education.

The Youth Mentor program is a ten week summer program. After a formal interview and placement, participants learn how to fill out job applications and are placed. Each participant volunteers 20-32 hours per week and receives a \$100 weekly stipend. Participants receive training in carpentry, minor building repairs, landscape maintenance, sprinkler repair, computer use, file mainte-

nance, and public relations. In the summer of 1998, 42 youth participated in the program. In 1999, 47 young people were selected to participate.

Building Stronger Families Program (BSF) - The goal of BSF is to provide a variety of activities that encourage and maintain family unity and strengthen relationships within the family. BSF is open to families who participate in the Section 8 Family Unification and Family Self-Sufficiency Programs. This new program is fully supported through grants and donations. Families will learn to have more fun, experiencing the joy of a happy family living in harmony.

Section 3 Resident Employment Program (REP) - The REP provides opportunities for residents to work on Housing Authority complexes. Before a complex is remodeled, residents are asked if they want to be included in a Housing Authority Resident Job Skills Bank. If so, they complete a questionnaire that asks educational level, languages spoken, and professional and office skills. Worker pools are then created which facilitate the hire of residents by contractors and the Housing Authority.

Temporary Work Crew - A crew of 62 workers is currently performing non-routine maintenance, betterments and additions to public housing. The crew is made up primarily of Human Services System-CalWORKS (formerly GAIN) participants. Many crew members are also public housing residents who are gaining valuable job experience.

Before hire, qualified individuals complete a 14 week course at the California School of Technology in various construction trades with funding provided with Fresno Workforce Development Board's Job Specific training funds. Prospective crew members complete two, 32 hour courses in lead-based paint and asbestos abatement. Certificates qualify workers to remove hazardous materials which may be found during residential remodeling work.

Work crews install new windows, interior and exterior doors, jambs and casings, replacing fascias, cover soffits, install new siding and attic vents on the gable ends, apply a new dash coat to stucco exteriors, and remove and replace floor tile. Workers are recruited through an agreement with Fresno County's Department of Social Services CalWORKS Program. Residents living in the complexes being remodeled are encouraged to attend the training and be hired to complete the modernization work.

7. Sale of Subsidized Housing and Possible Development

a. Number of Rental Units Anticipated to be Lost - The Housing Authority is actively involved in creating home ownership opportunities for its tenants and other very low- and low-income individuals. Many single family homes acquired, owned and operated by the Fresno Housing Authority have been, or will be, sold to tenants through a home ownership program called the Home Ownership Opportunities Program. While this program assists with policies and programs designed to increase home ownership opportunities, it does lead to a reduction in affordable rental housing. The Housing Authority offsets these losses through operation of other programs that are described in Section V(A6). The local housing supply has been reduced by 23 units of multiple family housing because of the Extension of Freeway 180 by the California State Department of Transportation. To date, the Housing Authority has purchased 19 homes from CALTRANS and moved them to new locations. An additional 13 houses have been purchased. Twenty-seven of these 32 homes have been sold to low-income families.

The Housing Authority has made every effort to maintain its existing housing stock and has requested and received funding to provide an ongoing maintenance and renovation program for its units. As a result, there has been no loss of units within its program. Through density bonus programs, housing rehabilitation and other programs, the City is acting to replenish the supply of lost units and create a larger supply.

b. Relocation and Rehabilitation. If relocation is required, compensation is provided to assist with the transition. The City has adopted an ordinance requiring landlords to fund relocation costs for displaced households when code enforcement actions are taken by the City. It is possible that relocation may provide the opportunity to improve a family's housing conditions. Often those that are displaced are low-income households, with limited means to secure decent, adequate and affordable housing. The City recognizes that these families are generally occupying housing that is very affordable due to age, deferred maintenance and few, if any, improvements. By providing equitable compensation and relocation assistance, it is possible to significantly improve the housing conditions for low- and very low-income families through relocation while also stimulating economic growth and neighborhood revitalization. The City is committed to providing relocation assistance when required by government regulations.

The City is providing funding for the rehabilitation of existing owner-occupied units through the use of CDBG, HOME, and/or HSA funds. In FY 2000, it is anticipated that this program will be utilized and result in the rehabilitation of 40 units. The City

is providing funding for the rehabilitation and repair of existing rental properties using Rental Repair Revolving (RRR) and other funds. In FY 2000, it is anticipated that the RRR program will result in 10 units rehabilitated. The City shall continue inspection activities for lead-based paint, asbestos, and other health and safety hazards that may exist in structures rehabilitated for occupancy.

The Housing Authority is also implementing a rehabilitation program. The Housing Authority is continuing this program in FY 2000 with an anticipated expenditure of approximately \$2.2 million to repair existing units. This may result in approximately 153 units being rehabilitated. Improvements shall be accomplished through the use of comprehensive grant funds. The Housing Authority is including features that enhance accessibility and visitability in its housing projects. See Section V (A6) for more details regarding Housing Authority programs.

8. Property Tax Policies

The Fresno County Tax Assessor, Auditor-Controller and Tax Collection offices prepare, distribute and process property tax information, distributions and collections. All functions are implemented consistent with state and federal law and local ordinances. The County offers two programs that offer some relief to low-income homeowners. All homeowners living in their own dwelling can qualify for a flat rate homeowner's exemption. The County Board of Supervisors also adopted the provisions of Proposition 60 which provide a tax break for the elderly. Under this program, senior citizens can keep their lower Proposition 13 tax base and rate if they purchase a dwelling of lower or equal value. This provision is beneficial to seniors whose income has dropped or is fixed and who need to seek housing more suitable to their needs such as those with lower maintenance responsibilities, smaller, or with transitional living opportunities.

The State of California offers a Homeowner Assistance Claim program. This homeowner assistance program provides a once a year payment from the state based on a portion of the property tax assessed on a home. Persons who are blind, disabled or age 62 and older and had a total household income of \$13,200 or less, or a gross household income of \$24,000 or less (total household income from Form FTB 9000, Homeowner Assistance Claim, plus all non-cash business expenses) qualify for a rebate.

9. Appointed Boards, Commissions, and Committees

The City has at least 31 appointed Commissions and Committees with 231 members who affect or are involved in development, housing and neighborhood issues. All

decisions regarding land use and property development are handled through the Planning Commission. The Housing and Community Development Commission oversees housing plans and programs. Other commissions and advisory committees include, but are not limited to, 12 neighborhood specific advisory groups, the Historic Preservation Commission, the Committee on Employment for the Disabled, the ADA Advisory Committee, and the Apartment Vacancy Task Force. In order to affirmatively further fair housing, it is important that decision makers at all levels represent all sectors of the population to the extent feasible.

As of March 1999, 65 percent of the City's appointed decision makers are Caucasian as compared to 49 percent of the population as a whole; 16 percent are African American as compared to 8 percent of the total population, 19 percent are Hispanic compared to 30 percent of the total population; zero percent are Asian American as compared to 12 percent of the total population; and 0.5 percent are Native American compared to 0.3 percent of the total population. The City Planning Commission is composed of 57 percent Caucasian and 43 percent minority group members. The Housing and Community Development Commission is composed of 34 percent Caucasian and 66 percent (33 percent Hispanic, 33 percent African American) minority group members, and 50 percent female/50 percent male members. African Americans and Caucasians appear to be well represented in decision making groups. Asian Americans and Hispanics need to become more involved.

Seven percent (16 of 231) of appointed decision makers did not disclose racial or ethnic characteristics. It is possible that some of these individuals could be from Asian American cultures. Many of Fresno's Asian American residents were victims of wars in southeast Asia. Members of this group are sometimes reluctant to disclose racial or ethnic information if they have a choice. In any event, there is a significant need to reach out to Asian American groups in hopes of increasing participation in decision making processes that can further their efforts to overcome housing obstacles. In 1999, the City will directly recruit Asian American volunteers and devise a mailer to be sent to key Asian American organizations requesting that their members be encouraged to participate in local government decision making. Staff will also emphasize openings and opportunities to all groups during neighborhood outreach and other meetings.

The City has a twelve member ADA Advisory Council that addresses accessibility, visitability and ADA issues. Most of the members possess some type of disability. This Committee was not included in the previous analysis because the City does not have information regarding its ethnic or racial composition. Staff has observed that persons with disabilities who have not provided formal statements to the City are participating in a variety of committees. The City is reluctant to ask for even

voluntary disclosure of disabilities for openings because it may discourage participation. Many members of the disabled community, particularly seniors with hearing, vision, motor and other disabilities, do not care to disclose impairments.

The City has created a website. The City is placing its housing education brochure and other applicable materials on the web. The City is also placing public notices and/or applications for commissions, boards and citizen advisory committees on the web to broaden recruitment opportunities. The FHC works with eight television stations, including Vida en el Valle. These and other media opportunities will be used to publicize openings and participation opportunities directly to Asian American, Hispanic and disabled advocacy groups including those that reach the frail elderly. These actions should help to further diversify appointments to City sponsored positions.

10. Building Codes

Building codes are intended to protect the public health and safety. Proper implementation of fire, water and other regulations ensures that housing is safe and liveable over the long term. It is the City's responsibility to ensure that codes are implemented including regulations required by state and federal legislation. The City is committed to requiring code conformance in new construction and working to improve code compliance during rehabilitation, code enforcement and modernization programs.

The City fully implements all required local, state and federal laws including Title 24, Chapter 11 A of the California Building Code. The Code was amended in 1993 to be consistent with the federal Fair Housing Act amendments. This chapter codifies building requirements for persons with disabilities. It only applies to new multiple family units. This chapter is easy to implement because all building permits are reviewed by knowledgeable staff whose mission is to ensure compliance with all applicable codes.

There is a new clause in the state code requiring that accessibility features in commercial buildings, such as signs and physical features, be maintained. There is currently no way for the City to determine compliance with this requirement. The City is currently working with its advisory committee for the disabled and the City Architect to determine methods for ensuring that building owners and occupants as well as building users are aware of their rights and responsibilities, and know how to resolve identified problems. The City intends to incorporate strategies developed by the working group into its public education action plan.

There are two main areas where local, state and federal regulations do not always address accessibility or visitability issues: one is new single family housing; and another is housing rehabilitation or remodeling funded with private sector resources. The City is expanding its education program to include persons and developers undertaking these kinds of construction projects including presentations of information to organizations such as the American Institute of Architects. The intent is to stimulate interest in the incorporation of accessibility features into new single family construction and remodeling projects with the intent of providing universally designed housing; that is housing that provides for the needs of all population segments. For example, architects and staff, where feasible, could advise retirees constructing new homes that they may want to plan for their long term future or for visits from aging friends and family. They and others may plan for elderly and visitors with disabilities, strollers, tricycles, grocery carts, and rollable luggage. Code enforcement and rehabilitation programs may present opportunities for advancing accessibility and visibility goals and objectives. It is possible that public or private resources could be identified, or state or federal legislation sought, to provide tax or other incentive credits to those who voluntarily provide accessibility features.

The City is funding code enforcement activities intended to ensure that existing housing is safe and sanitary. In 1999, it is projected that the Code Enforcement Division will receive approximately 2,600 housing code complaints related to health and safety issues involving both single family and multi-family residential units. Staff effort is focused on the investigation and correction of all substandard conditions. During remediation actions, the City seeks to advise property owners of funding resources available to upgrade homes and apartments to include accessible features.

B. PRIVATE SECTOR

The development industry is faced with a variety of constraints in the construction of housing. These constraints limit the number and increase the cost of housing and may be loosely classified as market, governmental, physical, environmental and social in nature. The following sections include descriptions of the constraints and discusses interrelationships between them.

1. Land Costs, Land Use Controls and On and Off-Site Improvements

In absolute terms, sufficient land is available to accommodate growth within the Fresno area through the turn of the century. Land is still available at reasonable prices compared to other large urban areas of California. While sufficient land is designated by adopted plans to accommodate projected growth, land available for

immediate development is limited to areas within a reasonable distance of the urbanized area. These areas include properties which can be annexed to the City and for which services can be extended at a reasonable cost. The development of adequate and fair financing mechanisms for (1) planning, processing and completion of infrastructure and (2) planning for the staging of growth is one of the most significant land use related problems of the coming decade.

2. Materials and Labor

Labor costs have remained relatively constant since 1985, with only minor increases. In terms of building materials, some sectors of the economy have been slow to respond to increased production needs. In 1999, shortages of dry wall and other building products has become more prevalent. These factors, however, have acted as only minimal constraints to the production of an adequate supply of housing. Labor and material costs as a percent of total housing cost have decreased in the last decade.

3. Financing Costs, Lending Policies and Practices

The cost of money for site preparation and construction is an important determinant of the final cost to the home buyer. Market value created by supply and demand, location and other factors is the main determinant. Mortgage rates have a dramatic effect on the cost of housing to the home buyer and on the cost of constructing rental units. Interest rates are ultimately passed on to the renter by the apartment owner.

Current low mortgage interest rates have increased the rate of refinancing but until recently did not lead to significant increases in home sales. This is because the long-term health of the economy and the ability to pay increased mortgage payments for a new home overrode the effect of low interest rates. However, California's economy now seems to be improving and stabilizing.

4. Home Mortgage Disclosure Data (HMDA) and Practices

No program to provide fair housing can be successful if qualified women or members of minority groups are denied loans because of race, ethnicity or sex. Therefore, the City contracts with the CSUF on a regular basis to conduct studies of home mortgage lending practices. In 1998-99, to evaluate potential or existing lending patterns that could impede free housing choice, the City funded a CSUF study which evaluated mortgage loan denials in the City between 1992-1996. The following discussion provides a summary of those findings. It also includes independent evaluation and results of research conducted by the City.

The CSUF study found that the City is a relatively good place overall to obtain a home mortgage loan. Loan denials ranged from a low of 14.6 percent (1993) to 18.1 percent (1996) in the five years studied. The three major reasons for loan denial were excessive debt, lack of collateral, and credit history. For some protected classes, such as Asian Americans, there was essentially no difference in the percentage of loans denied when compared to Caucasians. The difference between female and male denials averaged 2.3 percent during the life of the study; that is women were denied 2.3 percent more frequently than males. This figure was considered too small to cause concern or warrant further study. The number of Native Americans who applied for loans was too small for any analysis to be reliable. Therefore, no conclusions were drawn regarding that group.

An area of potential concern identified by the researchers is the disparity between the percentage of loans denied to two protected classes as opposed to Caucasian groups. The following table indicates the percentage of additional times Hispanic and African American applicants were denied loans, when compared to Caucasians. There is no consideration for income (see Table 13), debt, credit history or other characteristics. Additional data refinement and analysis follows the table.

Table 13 - Percent Difference in Loans Denied for Two Protected Groups with No Consideration for Income or Other Characteristics³

Group Compared	1992	1993	1994	1995	1996
African American-Caucasian	16.9	9.8	12.2	8.3	6.8
Hispanic-Caucasian	11.7	5.5	3.9	4.8	4.4

Table 13 indicates an overall positive trend in home lending patterns. The percentage of difference among Caucasians and the two protected groups declined substantially between 1992 and 1996. For Hispanics, the identified disparity has declined by almost 60 percent; for African Americans by more than 50 percent. If the trend of percentage of differences over the life of the study continues, it is likely that existing disparities may essentially disappear.

The disparity found between African Americans and Caucasian applicants could indicate at face value that some discrimination may be occurring. It is important to keep in mind, however, that Table 13 does not include income or other characteristics as possible reasons for loan denial. As the AI has disclosed, Caucasian households

³Note that Asian Americans experience the same advantage as Caucasians.

enjoy a much higher income than other groups. It is likely that income is an important reason for the differences between rates of loan denials.

This conclusion is supported for the most part when income is figured into the equation. Table 14 indicates the effect of income on patterns of loan denials. In 1992, for example, low-income African Americans were 17.1 percent less likely to obtain a loan than a low-income Caucasian. There was only a 1.1 percent difference in 1996. The negative numbers that show up for low-income Hispanics in 1995 and 1996 indicate that they were more likely to get loans approved than Caucasians.

**Table 14 - Percent Difference Loans Denied for Protected Groups
Within Income Quintiles⁴**

Quintile	Group Comparison	1992	1993	1994	1995	1996
Lowest	African American - Caucasian	17.1	13.0	10.7	3.0	1.1
Lowest	Hispanic - Caucasian	12.9	2.5	1.5	-3.7	-3.7
Highest	African American - Caucasian	11.7	4.3	19.4	1.2	3.3
Highest	Hispanic - Caucasian	5.6	5.1	3.2	7.2	8.0

CSUF 1999 HMDA Study

As Table 14 indicates, disparities among loan denial rates essentially disappeared between 1992 and 1996 when income was calculated into the denial rates for low-income groups. In fact, low-income Caucasians appear to now have essentially the same or lower rates of loan approval.

Among higher income African American and Caucasian applicants, differences in loan denial rates appear to be declining toward insignificance with rates dropping from 11.7 percent to 3.3 percent during the study period. The exception was 1994 when there was a spike in loan denials to higher income African Americans. The only area where disparities have not yet declined toward insignificance is for loans to higher income Hispanic applicants. Denials have ranged from 3.2 percent higher than Caucasians and Asian Americans in 1994 to 8 percent higher in 1996. Higher income African Americans enjoyed a 6 percent advantage over Hispanic applicants in 1995 and a 4.7 percent edge in 1996.

⁴Note that Asian Americans were found to experience generally the same advantages and disadvantages as Caucasians.

To determine why high income Hispanics might be denied loans more frequently than Caucasians, Asian Americans and African Americans, a review of reasons given for home loan denials, such as debt, credit history and collateral, was undertaken. It appears that there may be some correlation between the difference in the percentage of loans denied and the amount of debt reported by higher income Hispanics. This is an important finding. The researchers reported that debt and collateral are easy to identify and quantify. If discrimination occurs, it is more easily hidden in credit history denials because they are so subjective. In other words, if debt is the reason given for a loan denial, it is likely to be the actual reason as opposed to a cloak for discrimination.

Table 14 indicates that the percentage of loans denied to high income Hispanics as compared to Caucasians increased from 5.6 percent to 8.0 percent, an increase of 2.4 percent, between 1992 and 1996. During that same time period, the debt ratio increased from a negative 2.0 percent to a positive 3.0 percent, an increase of 5.0 percent. In other words, the reason for denying a loan to high income Hispanics was stated as too much debt 5 percent more often than Caucasians. The same trend holds true for the difference in loan denials between high income Hispanics and African Americans.

In 1992, Hispanics experienced a 6.1 percent advantage over African Americans when it came to securing a loan. In 1996, the situation had reversed. High income Hispanics were denied loans 4.7 percent more often than African Americans, a 10.8 percent change. During the same period, the amount of debt carried by Hispanics changed from 2.1 percent more than African Americans to 7.7 percent more, an increase of 5.6 percent. This data support a conclusion that the accumulation of higher debt by high income Hispanics may be the explanation for their disadvantage in obtaining loan approvals as compared to Caucasians, Asian Americans and African Americans, while low-income Hispanics experience an advantage over the same groups.

The conclusions to be drawn from the 1999 CSUF HMDA study and subsequent analysis are:

- During the five year study period, there was significant movement toward equalization of loan approval rates for all groups.
- Loans to Asian Americans are generally granted at the same rate as Caucasians.

- Higher income Caucasians and Asian Americans in Fresno are more likely to be granted a home mortgage loan than higher income African Americans (3.3 percent in 1996) or higher income Hispanics (8 percent in 1996). Debt appears to be a key reason for the disadvantage found for Hispanics.
- Lower income Caucasians, Asian Americans and African Americans are denied loans at approximately the same rate. Lower income Hispanics appear to have a small advantage when compared to Caucasians and Asian Americans (-3.7 percent in 1996) and African Americans (-2.6 percent in 1996).
- Males appear to enjoy a very small (ranging from 0.9 percent to 4.1 percent) advantage over female loan applicants. The numbers are too small to warrant further study.
- Conclusions are based on available statistics regarding applications and approvals of loans. It is unknown whether protected groups are being discouraged from entering the housing market or applying for loans.

Based on these conclusions, it appears that the City's programs to educate lenders and applicants regarding their rights and responsibilities may be working. With the exception of high income Hispanic applicants, it appears that differences between loan approval rates for all groups studied are disappearing. Even the differences for high income Hispanics are low when compared to other cities, such as Philadelphia, Milwaukee, Buffalo, New York, and Cleveland where differences in denial rates for all minority groups ranged between 13 percent and 20 percent in 1997 (Milwaukee Comptroller's Office). The City intends to continue to complete a more detailed study of the results of the April 1999 CSUF report. The City will work to ensure that affected groups and lenders are aware of study conclusions and work together to close remaining gaps between groups. The City will ask the FHC to include a discussion of HMDA study results in its education seminars. It is important to remember that an evaluation of home loan denial statistics cannot, by its nature, detect unrecorded discrimination. Only through audits, or other detection methods, can it be determined whether certain groups are being discouraged from entering the home ownership market or applying for loans. Through the FHC, and other partners, the City intends to continue to support programs to identify covert or overt discriminatory practices.

5. Real Estate Industry Practices

a. Ethics and Standards of Practice. Real estate sales agents and real estate brokers that are members of the Fresno Association of Realtors (FAR) are regulated by the "Professional Code of Ethics" prepared and distributed by the National Association of

Realtors. All sales agents and brokers, upon joining and becoming a member of the FAR, agree to abide by the Associations Code of Ethics and Standards of Practice. The agents and brokers agree to submit any disputes to arbitration and violations to the code of ethics are submitted to a Disciplinary Committee. Complaints against any realtor or broker, including those that are not members of the Association of Realtors, may also be submitted to the State of California Department of Real Estate.

The "Code of Ethics and Standards of Practice," Form No. 166-288, first adopted in 1996 and revised in 1997, contains specific language that prohibits discrimination by real estate agents and brokers. Under the section, DUTIES TO THE PUBLIC, Article 10, the following is included:

"Realtors shall not deny equal professional services to any person for reasons of race, color, religion, sex, handicap, familial status, or national origin. Realtors shall not be party to any plan or agreement to discriminate against a person or persons on the basis of race, color, religion, sex, handicap, familial status or national origin." (Amended 1/90)

Standard of Practice 10.1 which was adopted in January 1994 reads as follows:

"Realtors shall not volunteer information regarding the racial, religious or ethnic composition of any neighborhood and shall not engage in any activity which may result in panic selling. Realtors shall not print, display or circulate any statement or advertisement with respect to the selling or renting of a property that indicates any preference, limitations or discrimination based on race, color, religion, sex, handicap, familial status or national origin."

b. Results of Rental Housing Studies. In 1989, the CHLB initiated a City-paid Fair Housing Audit to determine if discrimination in the City was taking place in the provision of rental housing within the community. This was done in response to an increased number of complaints filed with the DFEH during that year. That study indicated that there was widespread discrimination taking place in the rental housing market, particularly to families with children. Owners and managers were informing prospective tenants that units were not appropriate for large families. The City targeted this problem because large low-income families were already often unable to find housing with enough bedrooms to provide adequate space for all household members. Affordability is a significant problem for families already financially stressed because of family size.

Due to those results, the CHLB, in cooperation with the Fresno Rental Housing Association (FRHA), initiated a series of training sessions for managers of rental complexes relating to the provision of fair housing opportunities. In 1994, the CHLB

decided that it was appropriate to conduct a follow up study to determine the current state of rental housing practices within the City. Because discrimination in housing is illegal, the study did not lend itself to typical interview methodologies. In order to get the best indication of actual rental practices, eight “secret shoppers” representing various ethnic and racial groups and identified as having no children or having two children were utilized. The use of “secret shoppers” is an accepted way of verifying if discrimination is taking place. Utilizing shoppers of different races and ethnic makeup allows for a good comparison in the manner in which the shoppers were treated. The ethnic/racial groups were identified by the CHLB as White, African American, Hispanic, and Asians.

An analysis of study results led to the conclusion that discriminatory practices did occur. However, they did not appear to be pervasive. Moreover, it appeared that reverse discrimination may also have been taking place. This is evidenced by the fact that the average rent quoted to non-white shoppers was lower than for white shoppers and that the average security deposit was also lower for non-white shoppers than for white shoppers. The exception to this was in the area of reference checks. For that particular issue, white shoppers were told almost twice as often as non-white shoppers that no reference check would be required. The study conducted by the CHLB only represents a “snapshot” in time of the housing practices within the city.

c. Other Issues. Based on analysis undertaken during the AI process, the City is cautiously optimistic that fair housing education and enforcement, literacy, job training and employment programs, high vacancy rates, and increased employment opportunities, may be reducing instances of overt discrimination. At a minimum, mediation, education, fear of enforcement actions and counseling appear to be positively affecting fair housing opportunities. Nevertheless, the AI action plan includes additional fair housing audits, annual or semi annual review of insurance and lending data, expanded education programs, enforcement and ongoing vigilance in identifying and remedying discriminatory actions that can undermine fair housing opportunity. It is the City’s position that vigorous education and enforcement must continue until all traces of discrimination are eliminated.

Because of information provided by state and federal officials and discussions with other professionals, the City needs to continue to be on guard against the following practices.

- African Americans and Southeast Asian refugees are the racial/ethnic groups most likely to experience discrimination.

- Steering of racial/ethnic minorities and foreign born residents into and out of some neighborhoods occurs freely.
- Residents, public and private organizations and agencies often lack a fundamental awareness of the rights and responsibilities with respect to fair housing choice, particularly as they apply to persons with disabilities.
- Some newspapers do not monitor or implement fair housing policies in the real estate classified sections. Some advertising, for example, may describe characteristics of the landlord or neighborhood in exclusionary terms.
- The people most likely to be discriminated against are single women and single women with children (it is unclear how much difference in treatment the presence of children represents). It is women rather than men of various majority or minority racial and ethnic groups, religious affiliations, national origin, familial status etc. that experience more obstacles to fair housing choice. An exception to this general pattern is that elderly women are generally preferred over men in rental units.
- African American and Southeast Asian populations also face significant obstacles. Among these populations it is likely that men face greater discrimination than women of the same racial/ethnic groups.
- Middle class Caucasian and Hispanic men with or without families are the least likely to be discriminated against while very low- and low- to moderate-income Hispanic males are more likely than their Caucasian counterparts to experience discrimination.

The Courtyard Case (see Section IV B) is a clear indicator that steering, racial discrimination, and discrimination against families with small children is still occurring within the City. Even if significant discrimination cannot immediately be detected, this does not mean that it does not occur. There is a need to encourage the FHC, CHLB and others to continue to investigate and monitor the real estate business in hopes of discovering and ultimately eliminating barriers to fair housing choice.

The Fresno Association of Realtors (FAR) has been working to eliminate discriminatory practices among realtors. It currently has more than 1,100 members. During the preparation of the AI, staff from the FAR reported that, during calendar years 1997 and 1998, no complaints of housing discrimination had been filed with them.

In 1994, the City lost an excellent local assistant in its mission to affirmatively further fair housing. That year, the local office of the DFEH discontinued its provision of local housing discrimination complaint investigation services. Complaints are now handled through the office in Oakland. While the City understands the fiscal constraints that forced the change, the City is concerned that the lack of local state enforcement could reduce local resources for consumer education, dialogue, investigation and response times. The loss of this resource makes it even more important to support nonprofit, private and other organizations, such as the FHC, who can assume a leadership role in this community's quest to provide affordable housing to all of its residents.

6. Appraisal Industry Practices

Appraisal industry professionals are self-governed through the Uniform Standards of Professional Appraisal Practice (USPAP). The Foundation regularly updates the USPAP and provides assistance in the interpretation of the rules and regulations contained within the book. Licensed appraisers agree to abide by and be governed by the USPAP. Appraisal classes and seminars, including those that provide education regarding discriminatory practices, are sponsored by the Appraisal Institute.

The USPAP, in the section related to discrimination in appraisals, prohibits certain practices. The appraiser is prohibited from considering the ethnic composition of the neighborhood in appraising the property or even discussing ethnic composition as it may impact the sales or purchase price of the appraised property. The appraiser is further prohibited from making any general statements regarding the ethnic composition of the community, even if the neighborhood composition was not considered in evaluating and appraising the property. The appraiser is also prohibited from taking a picture of persons in the neighborhood as a method of showing the ethnic composition of the community to the buyer or seller of property. Regulatory relief is available for any discriminatory action by an appraiser.

Appraisal professionals practicing in the State of California are licensed by the State Department of Real Estate. This gives the state the authority to revoke an appraiser's license if they fail to comply with state regulations. In addition to activities, such as fraud, a basis for revocation of an appraiser's license is any discriminatory activity against a protected class, such as race, religion, age, disability, sex, familial status, sexual orientation, or source of income. The State Department of Real Estate reports that no appraiser, practicing within the City, had his or her license revoked because of discriminatory appraisal practices during the year 1997.

It is noted that appraisals that are under \$200,000 are considered de minimis and a licensed appraiser is not required to perform the appraisal. The majority of lending institutions, as well as many other real property related entities, do not recognize the de minimis exclusion. There is no method by which to track these types of appraisals or to determine if such appraisals are being conducted.

7. Insurance Industry Practices

Housing advocates have long expressed concerns about the perceived difficulty that low-income or minority individuals or households have securing necessary homeowner's and automobile insurance coverages. Adequate insurance coverage is necessary for the maintenance of employment and housing. Uninsured losses can devastate a household's resources and cause homelessness.

On March 12, 1999, the State Department of Insurance released the 1996 Commissioner's Report on Under served Communities. The report revealed that many low-income or minority communities were ignored by insurance firms when setting up agent offices and issuing homeowner and automobile insurance policies. The report was based on a study of policy writing practices information that insurers were required to provide in 1994 and 1995. The report included an examination of under served areas with high concentrations of minority residents, low-income households, and possessing high uninsured rates. A total of 151 of California's 1,713 zip codes were designated "under served."

The state found that: 13 percent of vehicles were registered in under served areas but only 6 percent of insurance offices were located there; roughly 16 percent of California's population lives in these areas, but only 4 percent of the state's 200,000 insurance agents live there; and some 6.6 percent of all homeowner's insurance was written in under served areas, but almost 22 percent of all fire insurance policies were written there. On the positive side, insurance rates declined in under served areas by almost 12 percent between 1995 and 1999.

In Fresno, five Zip Codes (93701, 93702, 93706, 93721, and 93725) are included in the Commissioner's list. The Zip Codes roughly correspond with the Central, Roosevelt and Edison Community Plan areas. The Roosevelt area has a large concentration of traditional (30.8 percent of City total) and privately managed (22 percent) public housing, and Section 8 subsidy (22 percent) housing units. Edison and the Central City also contain large amounts of public and subsidized housing. The Zip Codes that are under served appear to correspond with the type of low-income neighborhoods that the state suspected might be the subject of insurance industry neglect. In 2000, the City will evaluate the recently released report and

develop strategies to resolve identified issues. In the short term, the City will add insurance practitioners to its education program.

C. PUBLIC AND PRIVATE SECTOR

1. Fair Housing Enforcement

The City is committed to promoting a regional approach to the resolution of housing enforcement and education issues that cross boundaries. The City has determined that fair housing issues cannot be resolved without a commitment to work proactively with other urban cities, rural cities, counties and others in the region to craft a shared approach to problem solving. This is a major reason why the City has chosen to work through agencies such as the FHC and the CHLB of Fresno and Madera Counties who are regionally funded and jointly sponsored. The recently begun Continuum of Care Collaborative includes representatives of several agencies, counties and cities, nonprofit organizations and others who need to address and resolve shared challenges. Ongoing meetings are held with County and other officials, and joint County-City financial and staff contributions to projects and enforcement agencies is typical rather than an exception.

In April 1999, the City co-sponsored the 4th Annual Central Valley Fair Housing Conference. The conference was organized by the FHC. Topics included patterns and practices of sales and lending discrimination, fair lending and fair housing enforcement actions, interpretation of, and better compliance with, state fair housing laws, the federal perspective on fair housing compliance, effective tenant selection rules, procedures and practices, and methods to build a strong economic base through affirmative advertising. The City intends to continue to sponsor and participate in these annual events.

During the last three years, the City has allocated \$105,000 to provide financial assistance to the FHC and CHLB for affirmative fair housing counseling, outreach, workshops, and education; enforcement and advocacy; referral for discrimination; and tenant and home buying counseling. Although these are the key service providers, the City provides funding to many groups who provide housing counseling, mediation or other services including the Central Valley AIDS Foundation, the Fresno-Madera Agency on Aging, and Centro La Familia. See Appendix B for a more complete list of funded entities.

Public Access to Enforcement Organizations - The Handy Ride demand-activated, free bus service is available for the elderly and persons with disabilities who need access to housing program service facilities. Families with children must rely on the

FAX transit system or private transportation. See Sections III (D) and (F) for more information regarding transportation issues.

2. Public Involvement and Informational Programs

The City has provided funding for the FHC and CHLB to create and distribute brochures and other informational materials that focus on fair housing rights and responsibilities. FHC brochures are distributed at City offices. The City intends to publish housing related grant applications and application instructions on its website as well as public notice of openings on City appointed community groups, advisory committees, Commissions and Boards. The CHLB and the County of Fresno Development Services Department provide "RentSense," a phone service that provides a wide variety of information relating to housing and housing discrimination. This 24 hour service is available in English and Spanish.

The City conforms with all elements of HUD requirements for citizen notice and participation in housing plan reviews and developments related to its Consolidated Plan. In 1999, the City published a public notice of availability of the Information Guide for the 2000 Consolidated Plan and Project Proposal Form; sponsored a Technical Assistance Workshop; published another public notice of application deadline and to announce the Housing and Community Development Commission public hearing and applications review; and a public notice for the HUD-required, 30-day public review of the FY 2000 Consolidated Plan. Copies of the Consolidated Plan were available for review at several public locations. The notices and program documents are also provided on the City's web site.

The Mayor and City Council held public hearings on the entire FY 2000 City budget, including funding for the Consolidated Plan. In compliance with HUD regulations, the City also provided notice for public comments on its Consolidated Plan Annual Performance Evaluation Report. Two technical assistance workshops for submission of Consolidated Plan applications were held. In addition, on-site meetings were held with approximately eight citizen groups to discuss proposed HUD-funded infrastructure projects within their geographic area.

The City established a Citizens Advisory Committee (CAC) for its Neighborhood Revitalization Program which includes twelve neighborhood associations and several representatives of service agencies. The neighborhoods represented are located primarily within the CDBG areas of the City. During each fiscal year, staff works with each neighborhood association on their specific housing and neighborhood revitalization needs and remedies. For the past three years, three of the neighborhood

associations have requested that CDBG funds be earmarked for housing rehabilitation projects within their areas.

Because these citizen groups have been actively involved in the improvement of their neighborhoods, the City makes a point of providing up-to-date information to the CAC. In preparation for the FY 2000 Consolidated Plan update, for example, staff met with the CAC in November and December 1998 and January 1999 to discuss the results of previous year's funding, the current funding application process, the workshops for new funds, and the schedule of significant public hearing dates.

Staff also works with each Neighborhood Association on specific housing needs, especially on the subject of residential rehabilitation. The City continues to update CAC members on various stages of the Consolidated Plan, General Plan Update, and other housing program and processes. The Citizen Participation Plan for the Consolidated Plan and other housing programs has provisions for affirmatively furthering fair housing in the City.

The City Development Department continues to hold public meetings and engage in several discussion groups as part of its General Plan Update process. Draft Plan documents will be noticed and a public review period will be provided. Public hearings will follow.

The City continues to work closely with the Housing Authority, and the County of Fresno, in the preparation and execution of the City's Consolidated Plan Annual Action Plan. The City participates with other Central Valley cities in HUD workshops and networks with these cities in carrying out HUD-funded programs and activities. The City is taking a leadership role in reestablishing the Central Valley Housing Round Table that will meet semi-annually to discuss housing concerns.

The City will meet on an as needed basis with representatives of various organizations that are advocates for special needs groups such as the County Mental Health Department, the Homeless Coalition, the Committee for Employment of the Disabled, the California Association for Physically Handicapped and the ADA Advisory Committee.

3. Visitability in Housing

The term “visitability” means that dwellings include features that allow persons with mobility impairments to visit family and friends. A visitable home also serves persons without disabilities such as mothers with strollers, movers, delivery persons, and persons using a walker. The voluntary standard includes: (1) at least one entrance that is at grade (no step), and approached by an accessible route, such as a sidewalk; and (2) an entrance door and all interior doors on the first floor that are at least 34 inches wide, and offer 32 inches of clear passage. As previous sections of this report indicate, the City recognizes that accessibility and visitability are important, much needed and mandatory requirements of any fair housing program. The City has several programs that will enhance accessibility and visitability. See Section VII, Appendix A and the special needs section of Section III (D) for more information.

a. Code Enforcement. The City is funding code enforcement activities intended to ensure that existing housing is safe and sanitary. It is projected that the Code Enforcement Division will spend approximately \$3,184,800 and respond to more than 2,600 housing code complaints in FY 2000. Staff will work to resolve health and safety issues involving both single family and multi-family residential units. Staff effort will be focused on the investigation and correction of all substandard conditions. During investigation and remediation actions, the City will seek to inform property owners or residents of opportunities to enhance accessibility/visitability including available funding resources.

b. Rehabilitation Programs. The City has an ongoing program to fund rehabilitation of existing owner-occupied units through the use of CDBG, HOME, and/or HSA funds. It is anticipated that this program will be utilized and result in the rehabilitation of 40 units in FY 2000. The City is also funding the rehabilitation and repair of existing rental properties. Financed through Rental Repair Revolving funds, it is anticipated that the program will result in 5-10 units rehabilitated in FY 2000. As part of the inspection process, the City will seek to inform property owners or residents of opportunities to enhance accessibility/visitability features.

The City will continue to support programs offered by the Housing Authority that maximize opportunities to enhance accessibility and visitability during implementation of its rehabilitation program. The Housing Authority is expending approximately \$2.2 million in FY 2000 to repair approximately 153 units. Improvements shall be accomplished through the use of comprehensive grant funds.

c. New Construction. The City has identified public education on fair housing issues as a high priority in this AI. The City is working with the development community, real estate associations and other groups to improve awareness of accessibility and visitability needs and issues. The City has already begun a series of meetings with members of the Committee for Employment of the Disabled and ADA Advisory Committees with the intent of educating staff to visitability and accessibility issues, receiving ideas and recommendations for addressing issues, and collaborating on strategies to enhance existing programs and create new ones if appropriate. As part of an improved public education program, the City intends to educate staff, builders and members of the public to the rights and responsibilities surrounding accessibility and visitability.

The City will continue to require, consistent with the Fresno City Municipal Code, that buildings are constructed consistent with all required local, state and federal laws including the State of California Building Code, Title 24, Part 2, Chapter 11 A, for all new multi-family construction. Through outreach programs, the City intends to encourage the inclusion of accessible features in new single family homes and in remodel projects.